

REMARKS

Favorable review is requested in view of the above amendments and following remarks. Claims 1 - 10 have been cancelled without prejudice. Claims 11 - 27 have been added. No new matter has been added. Claims 11 - 14 and 17 - 27 are supported by the original claims. Claim 15 is supported, for example, at page 9, lines 14 - 15 of the specification. Claim 16 is supported, for example, at page 9, lines 14 - 16 of the specification. Claims 11 - 27 are pending in the application.

Rejections under 35 U.S.C. § 112

Claims 1 - 10 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicants respectfully traverse this rejection, and respectfully request reconsideration in view of the following comments.

Claims 1 - 10 have been cancelled. Claims 11 - 27 do not contain any of the alleged deficiencies. The specification and the claims provide that the product concentrate comprise 0.5 % to 99.5 % by weight of a lubricating component and 0.5 % to 90 % by weight of a clear solubility improver. Withdrawal of the rejection is requested.

Rejection under 35 U.S.C. § 103

Claims 1 - 10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over WO 95/08497 or Selbertinger et al. (U.S. Patent No. 5,758,761) in combination with Theyssen et al. (U.S. Patent No. 5,935,914) and Pierce (U.S. Patent No. 4,960,200). Applicants respectfully traverse this rejection, and respectfully request reconsideration in view of the following comments.

The invention claimed is directed at a method for lubricating and cleaning a conveyor for filling containers that hold beverages or foods. The method includes diluting a product concentrate with water by a first dilution factor to form a lubricating solution. The product concentrate is diluted with water by a second dilution factor to form a cleaning solution. The method includes contacting the conveyor with the lubricating solution and contacting the conveyor with the cleaning solution without interrupting the operation of the conveyor for filling containers that hold beverages or foods.

WO 95/08497, Selbertinger et al., Theyssen et al., and Pierce do not disclose or suggest diluting the same product concentrate with two different dilution factors to form a lubricating

solution and a cleaning solution. In addition, they do not disclose or suggest operating the system continuously, while lubricating and cleaning the conveyor system.

In particular, WO 95/08497 and Selbertinger et al., which are equivalents, are directed at mixing a dilutable concentrate of a cleaner, disinfectant, or mixture thereof, or a lubricant. See the Abstract and claim 1 of Selbertinger et al. Therefore, Selbertinger et al. and '497 are directed at using two different concentrates, not the same concentrate, to form the lubricating solution and the cleaning solution.

Theyssen et al. are directed at a single aqueous use solution for lubricating, cleaning, and disinfecting, not two different solutions. See column 16, lines 7 - 49 of Theyssen et al. Consequently, Theyssen et al. do not disclose or suggest diluting the same product concentrate with two different dilution factors to form a lubricating solution and a cleaning solution.

Pierce is directed at an apparatus for cleaning and sanitizing a conveyor belt. In particular, Pierce relates to an apparatus that uses a singular solution for sanitizing. See column 3, lines 30 - 35 of Pierce. Pierce does not disclose or suggest a lubricating solution. Therefore, Pierce does not disclose or suggest diluting the same produce concentrate with two different dilution factors to form a lubricating solution and a cleaning solution. Withdrawal of the rejection is requested.


Conclusion

In view of the amendments and comments presented herein, favorable reconsideration in the form of a Notice of Allowance is respectfully requested. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone the undersigned at the below-listed telephone number.

Respectfully submitted,

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